

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ANTHONY NESBIT,

Plaintiff,

vs.

DEPARTMENT OF PUBLIC  
SAFETY, STATE OF HAWAII, et. al.

Defendants.

WILLIAM KOTIS,

Plaintiff,

vs.

STATE OF HAWAII DEPT. OF  
PUBLIC SAFETY, et. al.

Defendants.

CIVIL NO. 03-00455 SOM-KSC  
(Consolidated)

CIVIL NO. 04-00167 SOM-KSC  
(Consolidated)

DECLARATION OF LUCY SEQUIERA

I, Lucy Sequiera, declare as follows:

1. I am the Medical Records Librarian III employed by the State of Hawai'i, and have been on the staff of Oahu Community Correctional Center since December 1999.
2. As the Medical Records Librarian, I am charged with the (1) medical records and files for the inmates housed at the correctional facilities for the Oahu Community Correctional Center and (2) I oversee all of the medical files and records in the Archive Section for inmates that have been released or transferred to mainland correctional facilities.

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3. I have reviewed the medical files and records for inmates Anthony Nesbit and William J. Kotis and have made my notations on my transcribed notes which are attached hereto as Exhibits "1" and "2", respectively.

Further, Declarant sayeth naught.

DATED: February 1, 2005.

  
LUCY SEQUIERA